

1 THE HONORABLE RICHARD A. JONES  
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13 UNITED STATES DISTRICT COURT  
14 WESTERN DISTRICT OF WASHINGTON  
15 AT SEATTLE

16 BOMBARDIER INC.,  
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19 Plaintiff,  
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21 v.  
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23 MITSUBISHI AIRCRAFT  
24 CORPORATION, MITSUBISHI  
25 AIRCRAFT CORPORATION AMERICA,  
26 INC., et al.,  
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28 Defendants.  
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32 2:18-cv-1543 RAJ  
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34 STIPULATED MOTION FOR A  
35 SCHEDULING CONFERENCE  
36  
37 Noted for Consideration: November 28, 2018  
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42 Plaintiff Bombardier Inc. (Bombardier) and all Defendants who have been served--  
43 Mitsubishi Aircraft Corporation America, Inc. (Mitsubishi Aircraft America), Aerospace Testing  
44 Engineering & Certification Inc. (AeroTEC), Laurus Basson (Basson) and Cindy Dorneval  
45 (Dorneval) (collectively, the Moving Parties), jointly request a scheduling conference pursuant to  
46 Fed. R. Civ. Proc. 16(a).  
47

48 Bombardier's Motion for Preliminary Injunction currently pending was filed on October  
49 19, 2018. It is noted for Dec. 14, 2018. The key documents supporting the Motion have not yet  
50 been served on the Defendants.  
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STIPULATED MOTION FOR A SCHEDULING  
CONFERENCE (NO. 18-CV-1543 RAJ) – 1

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Seattle, WA 98101-3099  
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Fax: 206.359.9000

1           The parties have conferred on scheduling and the following issues set forth below remain  
2           outstanding, and thus the parties request a scheduling conference from the Court to assist them in  
3           reaching resolution.

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6           1. Scheduling of Multiple Motions for Preliminary Injunctions:  
7           2. Access to Unserved Documents & Interim Confidentiality Agreement:  
8           3. Briefing Schedule for the Motion for Preliminary Injunction:  
9           4. Trade Secret Identification  
10           5. Preliminary Injunction Evidentiary Hearing

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RESPECTFULLY SUBMITTED this 28th day of November 2018.

22           *s/Brian F. McMahon*

23           John Denkenberger, WSBA No. 25907  
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35           Attorneys for Plaintiff Bombardier Inc.

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22           *s/Mary Z. Gaston*

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Attorneys for Defendant Mitsubishi Aircraft  
Corporation America, Inc.

STIPULATED MOTION FOR A SCHEDULING  
CONFERENCE (NO. 18-CV-1543 RAJ) – 2

121153-0002/142239371.1

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STIPULATED MOTION FOR A SCHEDULING  
CONFERENCE (NO. 18-CV-1543 RAJ) – 3

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2                   **CERTIFICATE OF SERVICE**  
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10                   I certify under penalty of perjury that on November 28, 2018, I electronically filed the  
11 foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of  
12 such filing to the email addresses indicated on the Court's Electronic Mail Notice List.  
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18                   DATED this 28th day of November, 2018.

19                   s/Mary Z. Gaston

20                   Mary Z. Gaston, WSBA No. 27258

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CERTIFICATE OF SERVICE  
(NO. 18-CV-1543 RAJ) – 1

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